

### **REMARKS**

Claims 1 - 20 remain pending in the application. Claims 1 - 20 have been rejected by the Examiner under 35 USC §102. The Applicant respectfully traverses the rejection and requests reconsideration.

#### ***Rejection of Claims 1 –20 under 35 USC §102(b) – Dansky, et al.***

Claims 1 –20 have been rejected under 35 USC §102(b) as being anticipated by Dansky, et al. (U.S. Patent No. 6,028,989). As stated in the previously filed response, Dansky, et al. discloses a three-procedure method for identifying nets that need to be repaired because they have been determined to exceed allowable noise limits. The first procedure uses a known crosstalk computer program tool to generate crosstalk rules that are then used to generate a crosstalk report, which contains weights associated with each victim/perpetrator net combination. The second procedure runs a program that uses the crosstalk report and seven other files to calculate noise voltages for each of the victim/perpetrator nets. The third procedure runs a program that uses the output from the second procedure to determine which victim/perpetrator nets have noise voltages that exceed allowable noise voltage limits.

In accordance with the present invention, the transition time of the victim signal alone is used to determine whether a potential noise problem exists on a signal line. Stated another way, the present invention makes a decision that no noise problem exists based solely on the determination that the signal transition time does not exceed a maximum transition time, as recited in independent claims 1, 2, 10, 11 and 17 - 20. Neither Dansky et al. nor any of the other prior art of record teach this feature of the present invention.

The Examiner states that Applicant's assertion that Danski et al. does not disclose using transition time degradation of the victim line is incorrect. In column 7, line 15 of Dansky et al., reference is made to the use of "per transition time ( $T_{rns}$ )" in the closed form equations to determine noise levels on the victim net. Looking at Tables A – F in Dansky et al., it does not appear that the transition time associated with the victim net is used in the

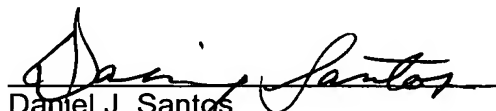
calculations. Nevertheless, it is clear that Dansky et al. does not make a decision as to whether or not a noise problem exists based solely on a comparison between the signal transition time of a line and a maximum signal transition time associated with the line. This is clear from the fact that Dansky et al. has a very involved procedure for calculating the noise level on a line.

Therefore, the Applicant respectfully submits that there is no teaching or suggestion in Dansky et al. of making a decision that no noise problem exists on a signal line based solely on determining that the signal transition time of the line does not exceed a maximum signal transition time associated with the signal line, as recited in each of the independent claims of the present application. For a rejection to be proper under 35 U.S.C. §102, each and every element of the claimed invention must be shown in a single reference. For at least the reason that Dansky et al. does not teach, either explicitly or implicitly, making a decision that no noise problem exists on a signal line if the signal line transition time does not exceed a maximum transition time associated with the signal line, it cannot be said that Dansky et al. anticipates the independent claims of the present application. Accordingly, the Applicant respectfully requests that this rejection be withdrawn.

**CONCLUSION**

For the reasons set forth above, it is respectfully submitted that all pending claims are now in condition for allowance, and such action by the Examiner is earnestly solicited. Should there be any further questions or concerns, the Examiner is urged to telephone the undersigned to expedite prosecution.

Respectfully submitted,  
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